

AMENDMENT UNDER 37 C.F.R. § 1.116
U.S. Patent Application No. 09/346,930

REMARKS

Reconsideration and allowance of the subject application. Upon entry of this Amendment, claims 1-29 are pending in the application. In response to the Office Action (Paper No. 10), Applicant respectfully submits that the pending claims define patentable subject matter.

Claims 1-5, 14, 24-26, 28 and 29 are rejected under 35 U.S.C. § 102(e) as being anticipated by Lindeberg et al. (USP 6,094,479; hereafter "Lindeberg"). Claims 6-13 and 15-23 are objected to as being dependent upon a rejected base claim but would be allowable if rewritten in independent form. Applicant respectfully requests the Examiner to hold in abeyance the rewriting of claims 6-13 and 15-23 until the Examiner has had the opportunity to reconsider the rejected parent claims in light of the arguments presented below in support of the Applicant's traverse of the rejection.

Independent claim 1 recites, in part, "an interface device (IM) coupled between a network switch (SSP) and a computer telephony integration (CTI) server means (CTS), said interface device (IM) being adapted to communicate between a service switching function device (SSF) having a service switching functionality and included within said network switch (SSP) and said CTI server means (CTS)." Independent claim 26 recites similar limitations.

In the Amendment filed September 4, 2002, Applicant argued that Lindeberg's CTI gateway 211 (which the Examiner asserts corresponds to the claimed interface device/means) is not coupled between a network switch and a CTI server means or adapted to communicate between a service switching function device included in the network switch and the CTI server means, as required by independent claims 1 and 26. Further, Applicant argued that the Lindeberg patent can not be

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considered as an "equivalent" to the present invention since the functionality of the interface means of the present invention and the CTI gateway of the Lindeberg patent are completely different, i.e., by means of the fact that the interface means of the present invention and the CTI gateway of the Lindeberg patent are interfacing with different entities within an intelligent network.

In response to the arguments for patentability in the Amendment filed September 4, the Examiner indicates that he disagrees with Applicant's position in that "the Examiner reads the interface device IM in Applicant's claimed invention is indirectly coupled between a network switch and a CTI server and being adapted to communicate between a SSP device and CTI server via SCF (see Fig. 6 of Lindeberg)." That is, the Examiner maintains that "the claimed language does not necessarily require the interface device directly connect between SSP and CTI, nor directly communicate between SSP and CTI server." Further, the Examiner indicates that the CTI gateway of Lindeberg is "equivalent" to the interface means of the Applicant's claimed invention since "there is not any definition of 'the interface means' in the claim to distinct the CTI gateway of Lindeberg ... [and the] CTI gateway of Lindeberg do[es] the job as an interface between CTI server and SSP as clearly disclosed along the patent."

By this Amendment, Applicant has amended independent claims 1 and 26 to recite that the interface device/means is "directly" coupled between the SSP and CTI server means and is adapted to "directly" communicate between the SSP and the CTI server means in order to more clearly distinguish the claimed invention from the disclosure of the Lindeberg patent. As shown in Figure 1 of Lindeberg, the CTI gateway 211 is indirectly coupled to the service switching

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points 241 and 245 (including service switching functionalities 242 and 246) via the service control point 231 including a service control function 232. This is an important difference between the Lindeberg patent and present invention in that the present invention teaches that the interface means communicates between a service switching function and the CTI server as opposed to the communication between the service control function and the CTI server which is performed by the Lindeberg patent. Thus, Applicant respectfully submits that the claimed invention would not have been anticipated by or rendered obvious in view of Lindeberg because the cited reference does not teach or suggest the interface device is directly connected between SSP and CTI, or directly communicates between SSF and CTI server, as claimed.

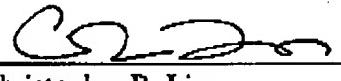
In view of the above, Applicant respectfully submits that independent claims 1 and 26, as well as dependent claims 2-5, 14, 24, 25, 28 and 29, should be allowable because the applied reference does not teach or suggest all of the features of the claims.

Reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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WASHINGTON OFFICE



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PATENT TRADEMARK OFFICE

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APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

The claims are amended as follows:

1. (Twice Amended) An interface device (IM) directly coupled between a network switch (SSP) and a computer telephony integration (CTI) server means (CTS), said interface device (IM) being adapted to directly communicate between a service switching function device (SSF) having a service switching functionality and included within said network switch (SSP) and said CTI server means (CTS).

26. (Twice Amended) An apparatus (A) for providing a service to at least one customer (C), said apparatus comprising:

a computer telephony integration (CTI) server means (CTS);
a network switch (SSP) including a service switching function device (SSF) having a service switching functionality;
an application programming interface (API) coupling said CTI server means (CTS) to an executable means (EM1,...,EM5), said executable means being adapted to execute said service; and

interface means (IM) directly coupled between said network switch (SSP) and said CTI server means (CTS), said interface means (IM) being adapted to directly communicate between

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[a] said service switching function device (SSF) of said network switch (SSP) and said CTI server means (CTS).